

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

WINIFRED BLACKLEDGE

Plaintiff,

V.

Case No. CV 2:06CV321-ID

**ALABAMA DEPARTMENT OF MENTAL)
HEALTH AND MENTAL)
RETARDATION, and JOHN HOUSTON)
in his official capacity as Commissioner,)
)
Defendant.)**

DEFENDANTS' OBJECTION TO PLAINTIFF'S EXHIBIT LIST

Come now the Defendants, by and through their attorneys of record, Deputy Attorney General and General Counsel, Courtney Tarver, and Alabama Assistant Attorney General Rebecca Luck, and object to the Plaintiff's exhibit list as follows:

1. Plaintiff failed to timely exchange her exhibits for review by the Defendants.
2. Defendant's review of Plaintiff's Exhibit List reveals generally that many of the Exhibits listed are not clearly identified, are not properly named, or have pages in a collection that is not representative of the document listed. Based thereon, we generally object to the Exhibit List and documents listed thereon as being not clearly identified or representative of what they purport to be.
3. Specifically, Defendant cannot determine which document Plaintiff names at numbers 8, 14, 21, 22, 41, 58, 59, 62, 89, 90, 62, 112, 125, 126, 128, 132, and 133.
4. Specifically, the following Plaintiff's Exhibits are incorrectly named or contain documents not identified, as follows: 3, 9, 13, 14, 18, 19, 20, 23, 25, 31, 35, 36, 37, 38, 39, 40,

41, 54, 55, 58, 59, 62, 79, 81, 84, 87, 89, 90, 92, 104, 108, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 125, and 126.

5. Until Plaintiff produces the Exhibits for inspection, the Defendant is at a disadvantage to object more specifically to the documents listed.

Respectfully submitted this, the 15th day of October, 2007.

TROY KING
ATTORNEY GENERAL

s/ Courtney W. Tarver
Courtney W. Tarver (TAR009)
Deputy Attorney General and General
Counsel
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing DEFENDANTS' OBJECTION TO PLAINTIFF'S EXHIBIT LIST has been served by use of this court's electronic filing system, CM/ECF, which will provide service to the following on this the 15TH day of October, 2007:

Josh D. Wilson, Esq.
WIGGINS, CHILDS, QUINN & PANTAZIS
The Kress Building
301 Nineteenth Street North
Birmingham, AL 35203

s/ Courtney W. Tarver
COURTNEY W. TARVER